

# ROBERT GUILD

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BY ELECTRONIC FILING AND SERVICE

January 28, 2019

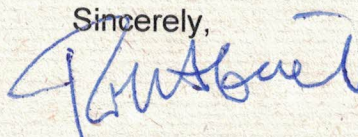
Ms. Jocelyn D. Boyd  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

In re: Application of Duke Energy Progress, LLC for Adjustments in Electric Rate  
Schedules and Tariffs and Request for an Accounting Order  
Docket No. 2018-318--E

Dear Ms. Boyd:

Enclosed please find for filing and consideration in the above docket the Petition  
to Intervene on behalf of Sierra Club, together with Certificate of Service.  
With kind regards I am

Sincerely,



Robert Guild

Encl.s

CC: All Parties





## (Caption of Case)

In re: Application of Duke Energy Progress, LLC for  
Adjustments in Electric Rate Schedules and Tariffs  
and Request for an Accounting Order

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

DOCKET  
NUMBER: 2018 - 318 - E

(Please type or print)

Submitted by: Robert GuildSC Bar Number: 2358Address: 314 Pall Mall StreetTelephone: (803) 917 573Columbia, SC 29201

Fax: \_\_\_\_\_

Other: \_\_\_\_\_

Email: bguild@mindspring.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☒ Request for item to be placed on Commission's Agenda expeditiously☐ Other: \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

Print Form

Reset Form

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2018-318-E**

In re: Application of Duke Energy  
Progress, LLC for Adjustments in  
Electric Rate Schedules and Tariffs and  
Request for an Accounting Order

**PETITION TO INTERVENE**

Pursuant to R.103-825 of the South Carolina Code of Regulations, Sierra Club hereby petitions to intervene in the above-captioned docket. In support of this petition, Sierra Club states as follows:

1. On November 8, 2018, Duke Energy Progress, LLC (“DEP” or the “Company”) filed an application with the Public Service Commission of South Carolina (“Commission”) requesting authority to adjust and increase its retail electric rates, charges, and tariffs and for an accounting order (“Application”).

2. On November 28, 2018, the Commission issued a Revised Notice of Filing and Hearing and Prefile Deadlines setting a February 1, 2019 deadline for petitions to intervene. Sierra Club’s Petition to Intervene, therefore, is timely filed.

3. Sierra Club is a national environmental organization whose mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth’s ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, Sierra Club works to accelerate the transition from

fossil fuels to clean energy solutions and advocates for state and federal policies and industry action to achieve this transition. Sierra Club has a long history of working to reduce pollution from coal-fired power plants and promoting clean energy sources in the Southeast.

4. The Club has participated as intervenors in multiple proceedings before the Commission, including, most recently, docket nos. 2018-322-E, 2018-321-E, 2017-370-E, 2017-305-E, 2017-207-E, 2016-223-E, 2015-103-E, 2015-55-E, 2015-54-E, and 2015-53-E.

5. Sierra Club and its more than 26,800 members who live in North and South Carolina—many of whom are customers of DEP—have a direct and substantial interest in this proceeding. The Company has sought to increase its monthly basic facilities charges as well as to generally increase its rates and seeks to justify the requested rate increase by identifying costs incurred in connection with the cleanup of its coal ash disposal sites. The Company's request implicates Sierra Club's organizational mission and interests. Moreover, Sierra Club's members who receive electricity service at their homes and businesses from the Company will be affected by the decisions of the Commission in this and future related proceedings.

6. Sierra Club and its members have an interest in ensuring that the rate structures approved by the Commission advance the important objectives of promoting cost-saving clean energy, efficiencies, and distributed generation, and avoiding disproportionate and unreasonable burdens on low-income South Carolinians. No other party will adequately represent Sierra Club's interests in this case.

7. Sierra Club seeks to intervene in this proceeding to ensure that its organizational interests and those of its members are represented in the Commission's decision-making process regarding the Company's request for a rate increase and changes to the existing rate structure.



Sierra Club's involvement in this proceeding will promote its members' interests as well as the broader public interest.

8. The address of the Sierra Club's principal office in South Carolina is 1314 Lincoln Street, Columbia, South Carolina 29201.

9. Pursuant to R.103-804(T) and R.103-805 of the South Carolina Code of Regulations, counsel representing Sierra Club in this proceeding is:

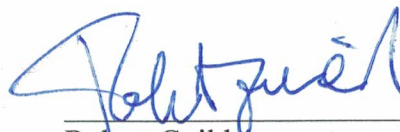
Robert Guild  
314 Pall Mall Street  
Columbia, SC 29201  
Tel: (803) 917-5738  
Email: bguild@mindspring.com

10. Sierra Club consents to service via electronic mail and requests that all communications regarding this docket should be directed to Sierra Club's counsel of record and:

Bridget Lee  
9 Pine Street, Suite D  
New York, NY 10005  
Tel: (845) 323-5493  
Email: bridget.lee@sierraclub.org

WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record in this proceeding.

Respectfully submitted this 28 th day of January, 2019.



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Robert Guild  
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Columbia, SC 29201  
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bguild@mindspring.com

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2018-318-E**

In re: Application of Duke Energy  
Progress, LLC for Adjustments in  
Electric Rate Schedules and Tariffs and  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket No. 2018-318-E, listed below, a copy of the Petition to Intervene of Sierra Club via electronic mail on this day, January 28, 2019.

Alexander W. Knowles,  
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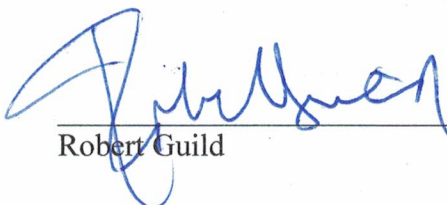
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Robert Guild